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February 15, 2024

**VIA ECF**

Hon. Denise L. Cote  
United States District Judge for the  
Southern District of New York  
500 Pearl Street, Courtroom 18B  
New York, New York 10007

*Granted.*  
*Denise L. Cote*  
*2/15/24*

**Re: Romaine McDaniel v. Scotch & Soda USA et. al.**  
**Civil Action No. 1:23-cv-07859-DLC**

Dear Your Honor:

Please be advised, the undersigned is counsel for Plaintiff Romaine McDaniel ("Plaintiff") in the above-captioned action. The undersigned writes to respectfully request a brief extension of time to file Plaintiff's Motion for a Default Judgment ("Motion for Default"), which deadline is currently February 16, 2024. This is Plaintiff's first request to extend the time to file Plaintiff's Motion for Default. As Defendants have not appeared or otherwise joined this matter, Plaintiff's counsel is unable to confirm Defendants' position on the instant request.

The basis for this request is that Plaintiff's counsel learned of the sudden and untimely passing of a loved one which necessitates Plaintiff's absence from the office to attend funeral services. Moreover, Plaintiff has been outside of the country until recently. Based on the foregoing, Plaintiff and her counsel have been unable to properly confer and perfect Plaintiff's Motion for Default papers and require a small amount of additional time to do so before filing.

Accordingly, Plaintiff respectfully requests one additional week to file Plaintiff's Motion for Default, which extends the deadline to Friday, February 23, 2024. The requested extension of time does not implicate or affect any other deadline or appearance scheduled in this matter.

Counsel remains available should Your Honor have any questions or concerns. Thank you.

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**Respectfully submitted,**

**NESENOFF & MILTENBERG LLP**

**By: Gabrielle Vinci**  
**Gabrielle Vinci, Esq.**